

## REMARKS

Reconsideration of the application, as amended, is respectfully requested. Applicants have amended Claims 21 and 28 to incorporate dependent Claim 24, and have canceled Claim 24. No new matter is introduced by this Amendment. Accordingly, entry of this Amendment is respectfully requested.

The Examiner has rejected Claims 21-22, 24-26 and 28-32 under 35 USC § 103(a) as allegedly unpatentable over U.S. Patent No. 5,625,338 to Pildner et al. ("Pildner") in view of U.S. Patent No. 5,991,279 to Haugli et al. ("Haugli") and further in view of U.S. Patent Publication No. 2002/0140571 to Hayes et al. ("Hayes") and yet further in view of FCC Regulation Part 15.

Applicants' independent Claims 21 and 28, as amended, recite a security alarm system and a method of synchronizing a security alarm system using the same. The security alarm system comprises, *inter alia*, a transmitter and receiver, each including clocks, **the clocks in the transmitter and receiver having no more than a 2 millisecond time shift relative to each other**. Claim 28, as amended, recites a similar method.

As admitted in the Office Action, Plidner, Haugli and Hayes fail to teach or suggest clocks in the transmitter and receiver having no more than a 2-millisecond time shift relative to each other.

Schreder teaches a circuit arrangement for switching an externally accessible service channel having an "... artificially-produced time shift in the digital service-channel signal bits incoming from the receiver at points at which control edges of the receive clock and the transmitted clock threaten to coincide in time . . ." (Col. 2, lines 12-19). However, Applicants

disagree with the Examiner's finding that Schreder teaches or suggests the specific limitation of 2ms time shift between each clock as recited in the amended base claims.

Schreder's apparatus relates to avoiding the *insertion of padding bits into pulse frames* (Col. 1, lines 45-50) and does not specifically require a 2 ms time shift to achieve this purpose. Accordingly, Schreder fails to suggest or teach a 2 ms time shift between the clocks in the transmitter and receiver, as recited in the amended base claim and which relates to *saving battery life* in a wireless keypad.

Regarding the Examiner's reference to FCC Regulation Part 15, Applicants note that the regulations do not suggest or teach clocks in the transmitter and receiver having no more than a 2-millisecond time shift relative to each other. As disclosed in the specification, the FCC rule allows up to 2 seconds of air-time to be transmitted per hour which can be used for the purposes of providing synchronization, polling, supervision etc. (page 3, paragraph [0008].

Therefore, the Examiner has failed to make out a *prima facie* case of obviousness as the combined references fail to suggest or teach a security alarm system or a method of doing the same comprising, *inter alia*, a transmitter and receiver, each including clocks, **the clocks in the transmitter and receiver having no more than a 2 millisecond time shift relative to each other**. Thus, none of Pildner, Haugli or Hayes, taken alone or in combination, discloses the combination of features recited in the Applicants' independent claims. Nor is there any motivation in any of the references taken alone or in combination to provide "**the clocks in the transmitter and receiver having no more than a 2 millisecond time shift relative to each other**," as recited in the Applicants' Claims 21 and 28. Therefore, Claims 21 and 28, from which Claims 22, 25-26 and 29-32 depend, are patentable over the combination of Pildner, Haugli,

Hayes, FCC Regulation Part 15 and Schreder. Accordingly, the rejection of Claims 21-22, 25-26 and 28-32 under 35 U.S.C. §103(a) is overcome and withdrawal thereof is respectfully requested.

In view of the foregoing, Applicants respectfully request reconsideration, withdrawal of all rejections, and allowance of all pending claims in due course.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'P. J. Esatto, Jr.', is positioned above the printed name.

Paul J. Esatto, Jr.

Registration No.: 30,749

Scully, Scott, Murphy & Presser, P.C.  
400 Garden City Plaza - Suite 300  
Garden City, New York 11530  
(516) 742-4343  
PJE/DJD:tam